



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

46725

MAY 26 1987

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Addendum to Region III Request for a \$2M Exemption and Ceiling
Increase for the North Road Site, Jackson Township, PA, Removal
--- ACTION MEMORANDUM

FROM: *Timothy Fields, Jr.* Timothy Fields, Jr., Director
Emergency Response Division *Henry J. Prump*

TO: Dr. J. Winston Porter, Assistant Administrator
Office of Solid Waste and Emergency Response

THRU: Henry L. Longest II, Director *H. L. Longest II*
Office of Emergency and Remedial Response

Issue

Region III has requested approval for continuation of a removal action at the North Road site in Jackson Township, PA. This request also represents a change in the scope of work to include the construction of a permanent water supply system. It is estimated that an additional \$1,907,850 will be required to complete the removal action at this site. If approved, this would raise the total project ceiling from \$852,150 to \$2,760,000.

Discussion

This Addendum provides additional information to clarify the attached Region III request for a \$2M exemption based on the emergency criteria for the North Road site. The attached Regional request is clarified as follows:

The "Contribute To Remedial Performance" section on page 6 is expanded as follows: Currently, the only source of uncontaminated water to the affected residents is the temporary supply of bottled water or carbon filtration units. Construction of a permanent water supply system, consisting of two 300-foot drinking water wells and water distribution system, is the only cost-effective, feasible alternative available at this site. Maintenance of periodic monitoring of contaminant levels of affected residential wells using carbon filtration and the high cost of providing bottled water is not a cost-effective solution in the long-term. No other source of drinking water is available on a timely and cost-effective basis by means of extension of an existing public water supply system. Installation of

AR400189

the two 300-foot drinking water wells will not interfere with the potential future ranking of the Butz Landfill on the National Priorities List or long-term plans to clean up the contaminated ground water plume at this site. After completion of the permanent water supply system, no further removal action is contemplated and the site will be referred to the remedial program for possible future action.

In the "Background" section on the top of page 3, the Excess Lifetime Cancer Risk (1/100,000) line should be changed from 1/100,000 to 1/10,000, which would equal 280.0 ppb. In conjunction, the Excess Lifetime Cancer Risk (10-6) trichloroethene (TCE) level should be changed from 2.7 ppb to 2.8 ppb. The amended TCE levels are now consistent with the current EPA drinking water policy.

TCE is referred to as trichloroethylene in the attached health letters. This is the old chemical name for trichloroethene. TCE is referred to as trichlorethene in this exemption request.

Recommendation

I recommend that you approve the \$2M exemption request for the North Road site. The site conditions continue to meet the criteria specified in the National Contingency Plan (\$300.65) and CERCLA §104(c). Your approval would raise the total project ceiling from \$852,150 to \$2,760,000 of which \$1,800,000 are for extramural costs. You may indicate your approval by signing below.

Approve: _____

Date: _____

JUN 2 1987

Disapprove: _____

Date: _____

Attachment

AR400190

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

NORTH ROAD SITE \$2 MILLION EXEMPTION

SUBJECT:

Continuation of Removal Activities at the
North Road Site, Jackson and Pocono Townships,
Monroe County, Pennsylvania

DATE: MAY 05 1987

FROM:

James M. Seif 
Regional Administrator (3RA00)

TO:

Dr. J. Winston Porter, Assistant Administrator
Solid Waste and Emergency Response (WH-562A)

THRU:

Henry L. Longest, Director
Office of Emergency and Remedial Response (WH-584)

ATTN:

Timothy Fields, Director
Emergency Response Division (WH-548E)

ISSUE

Continued immediate response actions are estimated to exceed the \$2,000,000 statutory limit and further actions to control and stabilize the site cannot be undertaken unless an exemption to Section 104(e) of Superfund Amendments and Reauthorization Act (SARA) of 1986 [104(c)(1) of CERCLA 1980 as amended] is granted and an increase in the ceiling is approved. It is estimated that an additional \$1,907,850 will be required to complete the removal action, bringing the total project ceiling to \$2,760,000. Please review the attached document and indicate your approval or disapproval in the space provided.

STATUTORY CRITERIA

Section 104(e) of SARA [104(c)(1) of CERCLA 1980 as amended] limits Federal Emergency Response to \$2,000,000 unless three basic criteria are met:

1. Continued response actions are immediately required to prevent, limit, or mitigate an emergency;
2. There is an immediate risk to public health or welfare or the environment; and
3. Such assistance will not otherwise be provided on a timely basis.

I believe that these criteria are met and have submitted the required documentation in the attached document. If there are any questions, please call Tom Massey at 597-8132 or myself at 597-9814. Thank you.

Attachments

AR400191

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: \$2,000,000 Exemption/Additional Funding Request for
CERCLA/SARA Removal Action at the North Road Site,
Jackson and Pocono Townships, Monroe County, PA

DATE: MAY 05 1987

FROM: David P. Wright, On-Scene Coordinator
Emergency Response Section (3HW22)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste and Emergency Response (WH-562-A)

THRU: James M. Seifert, Regional Administrator (3RA00)

THRU: Stanley L. Laskowski, Acting Director
Hazardous Waste Management Division (3HW00)

Attached for your review is the \$2,000,000 Exemption/Additional Funding Request for removal actions being conducted at the above site. The response action calls for the installation of a permanent alternate water supply to residents of the North Road area in Jackson and Pocono Townships, Monroe County, Pennsylvania, who are affected/potentially affected by extensive volatile organic (primarily TCE) groundwater contamination. This action will contribute to the efficient performance of any long-term remedial action.

A funding increase of \$1,907,850 is being requested, bringing the total project ceiling to \$2,760,000.

Please review the document and, if it meets with your approval, sign above and forward it directly to Dr. J. Winston Porter, Assistant Administrator of the Office of Solid Waste and Emergency Response, for his review and approval.

BACKGROUND

The Environmental Protection Agency (EPA), Region III initiated emergency action on July 22, 1986 to abate an immediate and substantial threat to public health and the environment posed by the presence of extensive volatile organic groundwater contamination (primarily TCE) in the North Road area of Jackson and Pocono Townships, Monroe County, PA.

AR400192

BACKGROUND (continued)

This initial action was approved by the OSC using \$50,000 Delegation of Authority (14-1-A, 5/1/85). On August 11, 1986 the Regional Administrator approved a ceiling increase to \$469,750 (which includes the \$50,000). On January 9, 1987 an exemption from the six-month limit/ceiling increase to \$734,250 was approved. An additional \$108,000 has been approved (April 3, 1987) to continue to provide bottled water and maintain and monitor the carbon filtration units. This brought the ceiling to \$842,250.

Approximately \$580,000 has been expended from the current authorized ceiling to cover the following:

1. Provision of a temporary alternate water supply (bottled water) to 28 locations.
2. Installation of carbon filtration units on wells at 22 locations. Two wells with the highest concentrations of TCE (7,000 ppb and 2,000 ppb) are also equipped with air stripper and ultraviolet units. Per ATSDR advisory (October 27, 1986), the wells (6) containing TCE concentrations that exceed EPA's lifetime health advisory value (260 ppb) should not be used for drinking, showering, bathing or cooking. The remaining 16 wells have been equipped with carbon filtration units as a prudent measure to safeguard public health until available scientific research can provide answers regarding health effects of low-level exposures.
3. Construction of 6 temporary sheds, to house the carbon filtration units, with installation of electrical and heating.
4. Completion of magnetometer and soil gas surveys in the area of North Road (8/20/86 to 8/21/86).
5. Installation of seventeen groundwater monitoring wells and measuring and sampling of these wells.
6. A total of 50 wells (in addition to the 17 monitoring wells) have been sampled for TCE contamination from July 1986 through February 1987. A total of 233 samples have been collected and analyzed.
7. Identification of the source and extent of the contamination plume.
8. Evaluation of data collected to date.
9. Completion of a preliminary engineering study and cost estimate for a water supply system in Jackson and Pocono Townships, Monroe County, PA.

AR400193

Trichloroethene (TCE) has been found to be as high as 7000 ppb in residential wells sampled. Existing criteria recognized by EPA are as follows:

1-Day Acute Toxicity	2000.0 ppb
Lifetime Health Advisory (or DWEL)	260.0 ppb
*50% of DWEL	130.0 ppb
Excess Lifetime Cancer Risk (1/100,000)	27.0 ppb
Proposed Maximum Contaminant Level (MCL)	5.0 ppb
Excess Lifetime Cancer Risk (10 ⁻⁶)	2.7 ppb

The OSC has determined that a permanent alternate water supply is the appropriate and necessary action to eliminate the direct threat to public health posed by the presence of volatile organic contamination in the groundwater in the North Road area.

DISCUSSION

A preliminary engineering study and cost estimate for a water supply system in Jackson and Pocono Townships, Monroe County, PA, has been completed. The system is designed to serve approximately 50 residences (includes a children's camp) within roughly a one mile radius of the North Road Landfill. The proposed service area includes all affected or potentially affected residences located on Railroad Drive, North Road, Possinger Drive, Route 715 between Possinger and Railroad Drives (which forms a loop) and residences located on Strausser, Storm and Tocca Roads (within the loop), and one residence at the end of an unnamed drive. See sampling locations map and impact zone map.

The estimated project cost of \$1,000,000 includes:

1. Drilling of two (2) 300-foot wells,
2. chlorination equipment,
3. 60,000-gallon steel storage tank,
4. 6" feeder lines with road,
5. 6" loop and branches with 3/4" house laterals, ferrules
6. 15% contingency.

The preliminary engineering study and cost estimate was presented to Jackson and Pocono Township and Monroe County officials on March 30, 1987. Township officials are currently working on a proposal for the formation of a joint municipal water authority to handle operation and maintenance (O & M) costs. Present net worth of O & M for 20 years has been estimated to total \$330,234.

*Refer to January 6, 1987 Memo from H. Longest to J. Moore titled "Proposed Policy on Removal Action Levels for Drinking Water Contamination Sites"

AR400194

The temporary provision of bottled water and carbon filtration units to residents of the affected area must continue until such time as the permanent alternate water supply is installed. The costs associated with the permanent solution will exceed the statutory limit of \$2,000,000.

STATUTORY CRITERIA

The manner in which the North Road Site meets the prescribed criteria for the \$2,000,000 exemption is as follows:

1. Continued response actions are immediately required to mitigate an emergency.

Within the area of the North Road Site, the well water of 21 residences, one children's camp (2 wells) and one business location has been determined to be contaminated with TCE (see attached map) which poses an immediate and substantial threat to public health. An additional number of residences within the area are currently determined to be free of contamination. Of the 24 contaminated wells, 22 have been provided activated carbon filtration systems by the OSC. Periodic monitoring of the operation of these filtration systems has been required to verify their efficiency, as well as to ensure that the contaminant concentrations in residences without filter systems do not rise to unsafe levels. Twenty-eight (28) locations are being provided with bottled water (several locations share the same well). The extent of the contamination plume has been determined and although it is "unlikely" that the 26 locations (currently determined to be free of TCE) and others within the loop (along Route 715) will become contaminated, the "potential" must be addressed (see impact zone map). A permanent alternate water supply is required to mitigate a significant risk of harm to affected or potentially affected residents in the impact zone of the plume.

Constant monitoring of residential wells in the North Road area is not possible. Therefore, the OSC has no way of knowing when the water in any residential water supply, at any point in time, may contain levels of volatile organics that pose a significant risk of harm to individuals consuming or bathing in the water. The residents of the affected area of North Road will not be adequately protected until they are provided with an alternative source of potable water. As long as a more permanent alternative is not provided, this removal action will not be complete pursuant to Section 300.65(a)(b) of the National Contingency Plan.

If removal actions are terminated, residents will no longer be supplied with a source of potable water or carbon filters and may go back to drinking and bathing in their well water, thus being exposed to the same threats as indicated in the original Action Memorandum. (See attachment).

2. There is an immediate risk to human health or the environment.

AR400195

Per the Agency for Toxic Substances and Disease Registry (ATSDR) recommendations, the OSC has supplied bottled water to 28 locations and carbon filters to 22 locations which have drinking water wells contaminated with volatile organics in concentrations high enough to pose a significant health threat. Two wells with the highest concentrations of TCE (7,000 and 2,000 ppb) are equipped with air stripper and ultraviolet units in addition to carbon filters. Per ATSDR advisory (October 27, 1986), the wells (6) containing TCE concentrations that exceed EPA's lifetime health advisory value (260 ppb) should not be used for drinking, showering, bathing or cooking. The remaining 16 wells have been equipped with carbon filtration units as a prudent measure to safeguard public health until available scientific research can provide answers regarding health effects of low-level exposures. Inhalation, ingestion, and absorption of chlorinated organic compounds can adversely affect the heart, liver, central nervous system, respiratory system, kidneys, skin, and eyes. The population surrounding the North Road Site includes many individuals who are sensitive to adverse affects resulting from the ingestion of volatile organics via drinking water. These individuals include, but are not limited to: young children, pregnant women, the aged, and the chronically infirm.

Trichloroethene (TCE) has been found to be as high as 7,000 ppb in residential wells sampled. Existing criteria recognized by EPA are as follows:

1-Day Acute Toxicity	2000.0 ppb
Lifetime Health Advisory (or DWEL)	300 260.0 ppb
*50% of DWEL	150 130.0 ppb
Excess Lifetime Cancer Risk (1/100,000)	27.0 ppb
Proposed Maximum Contaminant Level (MCL)	5.0 ppb
Excess Lifetime Cancer Risk (10^{-6})	2.7 ppb

The OSC has determined that a permanent alternate water supply is the appropriate and necessary action to eliminate the direct threat to public health posed by the presence of volatile organic contamination in the groundwater in the North Road area.

3. Assistance will not otherwise be provided on a timely basis.

Enforcement action against potential responsible parties has not been taken to date. The landfill, currently owned by Mr. and Mrs. Russell Butz and Ernest Butz, was previously operated by the Butzs. The hydrogeologic study performed by ERT/EERU with assistance from TAT points conclusively to the landfill as the source of contamination. The CERCLA Enforcement Section is currently investigating potential responsible parties who have utilized the landfill in the past and possibly contributed to the groundwater contamination.

There is no existing nearby purveyor of water whereby extension of service could be provided on a timely or economically sound basis. The proposed water supply system is the best alternative to provide potable water to residents affected or potentially affected by the contamination plume. Jackson and Pocono Townships do not have the capabilities to fund an action of this magnitude. The North Road Site is not on the National Priorities List (NPL).

AR400196

CONTRIBUTE TO REMEDIAL PERFORMANCE

In order to provide maximum protection of public health and the environment at minimal cost the OSC has determined that a permanent alternate water supply is the appropriate and necessary action. Because North Road is a non-NPL site where there are no plans for another party to perform long-term remedial action, the threats that meet the removal criteria in the National Contingency Plan (NCP) should be permanently cleaned up. The completion of the proposed alternate water supply will result in complete site cleanup and hence fully satisfy the provision to "contribute to efficient performance."

PROPOSED ACTIONS AND COSTS

Because Jackson and Pocono Townships cannot obtain funds in a timely fashion to address this threat, the proposed action will involve:

1. Continuing the provision of temporary alternate water supplies and carbon unit monitoring to residents of the North Road area until water system/line construction and hookup is completed.
2. Drilling of wells and construction of a water supply system to serve affected residences, one children's camp and one place of business.
3. Restoration of all properties with carbon filter units and drilled groundwater monitoring wells. The cost for providing the permanent water supply is as follows:

	<u>Current Ceiling</u>	<u>Amended Ceiling</u>	<u>Exemption/ Requested Additional Funds</u>	<u>New Ceiling</u>
EPA	\$ 73,000	\$ 73,000	\$ 30,000	\$ 103,000
TAT	142,000	142,000	80,000	222,000
ERCS	251,000	251,000	100,000	351,000
ERT/EERU	275,000	275,000	—	275,000
WATER SYSTEM				
1. Construction costs	—	—	1,000,000	1,000,000
2. Water system engineering and design	—	—	150,000	150,000
3. Right-of-way purchase and legal fees	—	—	50,000	50,000
4. Bid package preparation/ request for proposal and other administrative costs	—	—	60,000	60,000
5. Water system contingency (15%)	—	—	189,000	189,000
Amended EPA HQ 15% (4/3/87)	—	9,900	—	—
EPA HQ 15%	101,250	111,150	248,850	360,000
TOTALS	842,250	\$852,150	\$1,907,830	\$2,760,000

AR 400197

REQUEST FOR CEILING INCREASE

The cost to complete the remainder of this project is estimated to be \$1,907,850. I hereby request an increase in the ceiling to \$2,760,000.

REGIONAL RECOMMENDATION

Based on the information contained herein, I recommend that you concur in the \$2 Million Exemption/Additional Funding Request [SARA 104(e)] and approve the additional \$1,907,850 needed to continue emergency response actions and mitigate this immediate threat to public health. This would bring the total project ceiling to \$2,760,000 of which \$1,800,000 is extramural costs and \$960,000 is intramural costs.

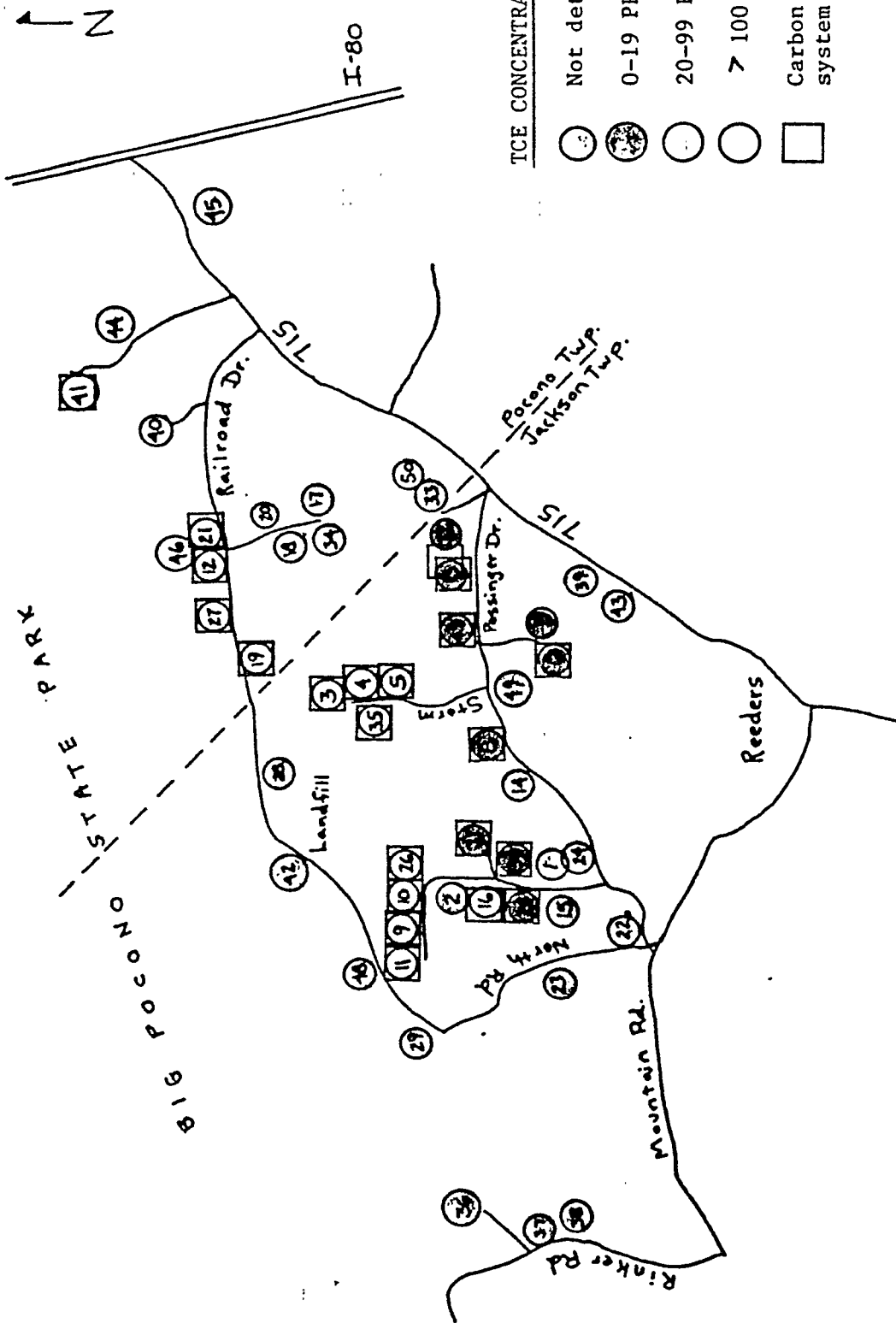
You may indicate your approval or disapproval by signing below. Due to the immediacy of this removal action, I would appreciate rapid consideration of the proposal and approval on the additional funds.

APPROVAL _____ DATE _____

DISAPPROVAL _____ DATE _____

Attachments: \$2,000,000 Exemption/Additional Funding Request
Copy of Original Action Memo
Copy of Six-Month Exemption
Sampling Location Map
Impact Zone Site Location Map
Regional Site Location Map
Bottled Water List
Carbon Filter List
Enforcement Section

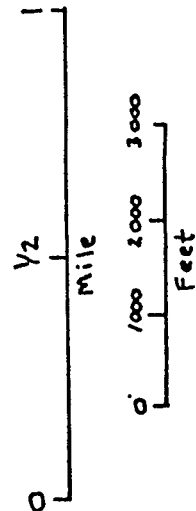
AR400198



TCE CONCENTRATIONS

- Not detected
- 0-19 PPB
- 20-99 PPB
- > 100 PPB
- Carbon filtration system

SAMPLING LOCATIONS
 NORTH ROAD SITE
 JACKSON & POCONO TWPS
 MONROE COUNTY, PA.



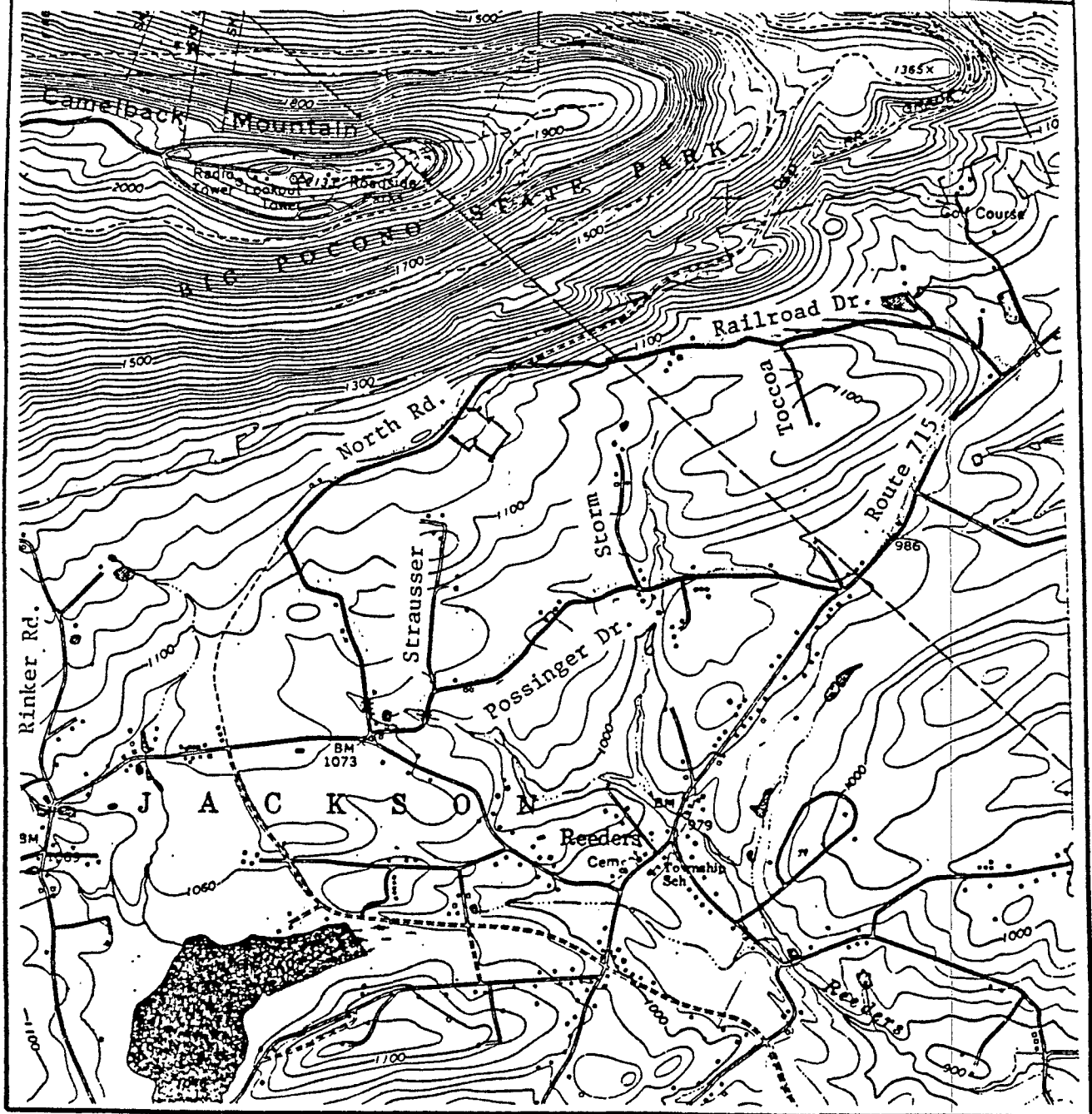
AR400199



WESTON · SPER

TDD Number: 8701-31

PCS Number: 1031



NORTH ROAD SITE LOCATION MAP

JACKSON & POCONO TOWNSHIPS

MONROE COUNTY, PA.

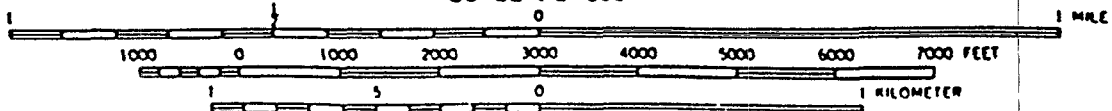
Mt. Pocono Quadrangle

Impact Zone

AR400200



SCALE 1:24000

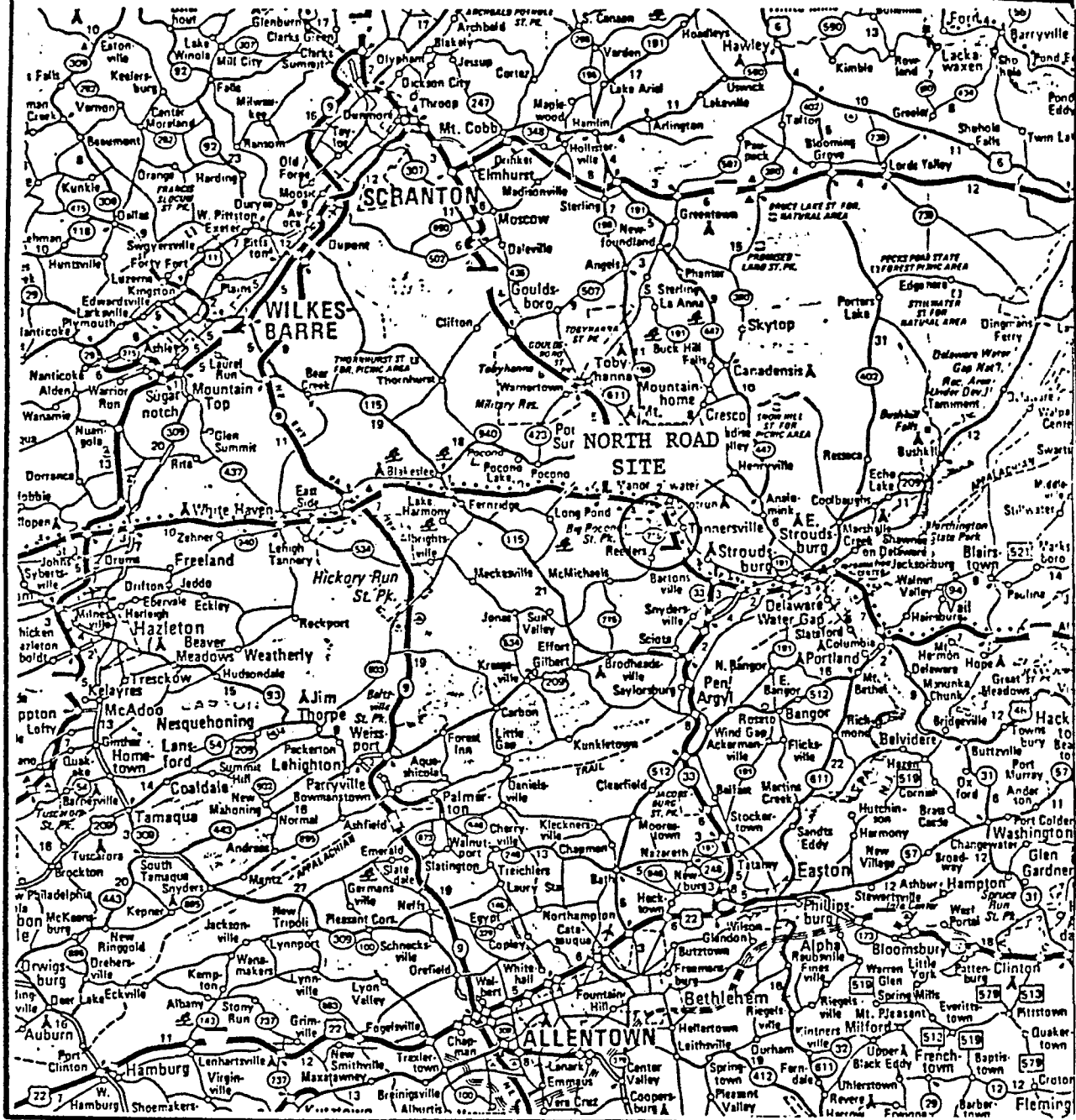




WESTON SPER

TDD Number: 8701-31

PCS Number: 1031



NORTH ROAD SITE LOCATION MAP
JACKSON & POCONO TOWNSHIPS
MONROE COUNTY, PA.

AR400201

NORTH ROAD LANDFILL SITE
BOTTLED WATER DELIVERED

Revised 1/15/

#	DATE	RESIDENCE	ADDRESS	TELEPHONE
01	07/23/86	LeRoy Rinker	R.D. #3, Stroudsburg, PA 18360	(717) 629-444
02	07/23/86	Roy and Florence Possinger	Box 91, Tannersville, PA 18372	(717) 629-416
03	07/23/86	Robert Bauer	R.D. #3, Box 3311, Stroudsburg, PA 18360	(717) 629-601
04	07/23/86	Douglas Jacoby	General Delivery, Reeders, PA 18352	(717) 629-388
05	07/23/86	Paul Strausser Sr. (D. Singer)	R.D. #3, Box 3319, Stroudsburg, PA 18360	(717) 629-231
06	07/23/86	Charles Young	R.D. #3, Box 3315, Stroudsburg, PA 18360	(717) 629-308
07	07/23/86	Donald Singer (P. Strausser Sr.)	R.D. #3, Box 3316, Stroudsburg, PA 18360	(717) 629-172
08	07/24/86	Camp Streamside Chapel Well	R.D. #3, Stroudsburg, PA 18360	(717) 629-190
09	07/24/86	Cooler switched/dining hall to Chapel		
10	07/24/86	Paul Strausser Jr.	R.D. #3, Box 3315, Stroudsburg, PA 18360	(717) 629-536
11	07/25/86	David Whitaker, Streamside Foundation, Camp Streamside	R.D. #3, Stroudsburg, PA 18360	(717) 629-190
12	07/29/86	Susan & Bernadette Stillo	P.O. Box 306, Reeders, PA 18352	(717) 629-031
13	07/29/86	Reginald Flowers	P.O. Box 18, Reeders, PA 18352	(717) 629-099
14	07/29/86	Chris and Margaret Kinsley	P.O. Box 3334A, Stroudsburg, PA 18360 (work)	(717) 421-603 (717) 629-599
15	07/30/86	Kenneth Wilgus	General Delivery, Reeders, PA 18352	(717) 629-518
16	08/07/86	Susan and Tom Petrus	R.D. #3, Box 3334, Stroudsburg, PA 18360	(717) 629-075
17	08/07/86	Marjorie Olshefski	R.D. #3, Box 3315, Stroudsburg, PA 18360	(717) 629-556
18	08/07/86	Russell and Loyes Meckes	R.D. #3, Box 342, Stroudsburg, PA 18360	(717) 629-448
19	08/07/86	Robert and Virginia Barthold	General Delivery Box 13, Reeders, PA 18352	(717) 629-415
20	08/07/86	Evelyn and Daniel Cappelletta	R.D. #3, Stroudsburg, PA 18360	(717) 629-041
21		received 2 coolers; one for main house, one for trailer behind (DeRosa)	(Mrs. Cappelletta at work) (same as above)	(717) 629-196 (717) 629-483
22	08/15/86	Rose Betticher	R.D. #3, Box 3355, Stroudsburg, PA 18360	(717) 629-412
23	08/25/86	Adcock Farmhouse Mrs. Woodrow Adcock	1135 Calvin Road, Huntington Valley, PA 19006	(215) 417-306 (717) 629-364
24	10/29/86	Thomas and Teresa Farda	Rt. 715, Tannersville, PA 18372	(717) 629-501
25	10/29/86	Paul and Joanne Snee	Rt. 715, Tannersville, PA 18372	Summit Resort (717) 629-020
26	12/03/86	Clarence and Verna Detrick	R.D. #3, Box 3306, Stroudsburg, PA 18360	(717) 629-291
27	12/03/86	(shares well with Detrick) Louis M. Mongilutz	Tannersville Inn Box 54, Tannersville, PA 18372	(work) (home) (717) 629-313
28	12/03/86	Fuel-Rite Petroleum (attn: John Haney)	R.D. #3, Box 697B, E. Stroudsburg, PA 18301	(717) 629-543

Total of 28 coolers.

AR400202

NORTH ROAD SITE
CARBON FILTER INSTALLATIONS

Revised 03/03/87

Loc	Map No.	TCE in PPB	Location	Date of Inst.	Carbon Filter Change	# of Filter Sys.	Aeration Date	Ultra-Violet Date	Shed	Flow Meter
1	4	7000	Possinger	07/25/86	09/19/86	1	09/12/86	10/01/86		12/12/86
2	3	2000	Rinker	07/25/86	09/23/86	1	09/12/86	10/01/86	existing	12/12/86
3	19	640	Adcock Farmhouse	09/17/86		1				
4	11	300	Flowers	09/19/86		1				
5	10	290	Barthold	09/30/86		1			09/29/86	
6	26	200	Jacoby	10/03/86		1			10/03/86	12/10/86
7	27	160	Betticher	10/08/86	01/09/87	1			10/09/86	
8	12	89	Kinsley	10/10/86		1			10/09/86	12/10/86
9	9	76	Wilgus	10/01/86		1			10/01/86	
10	16	32	Olshefski	09/26/86		1				
11	21	30	Petrus	09/24/86		1				
12	5	23	Bauer	09/24/86		1				
13	25	17	Cappolella	10/01/86		1				
14	30	5.4	P. Strausser, Jr.	10/08/86	12/05/86	1				
15	6	4.7	Camp Streamside*	07/28/86		3				
16	35	270 138	Bunnell**	09/22/86		1				
17	41	33.8	Thomas Farda*	11/03/86		1				
18	47	15.6	David Whitaker*	12/05/86	01/15/87	1				
19	13	7.9	Detrick*	01/12/87		1				
20	13	7.9	Mongilutz*	01/13/87		1				
21	8	8.7	Stillo*	01/14/87		1				
22	31	18.5	Young*	02/07/87		<u>1</u> 24	— 2	— 2	02/06/87	02/07/87

* Not on the original priority list.

** Had existing carbon filter unit—EPA authorized lease agreement 9/22/86.

AR400203